

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

NORTHPOINTE TOWNHOMES  
CONDOMINIUM ASSOCIATION,  
a Michigan nonprofit corporation,

Plaintiff,

v.

MEGMAD FAMILY TRUST,

Defendant.

\_\_\_\_\_ /

Julie A. Goldberg (CA Bar No. 235565)  
Monica R. Smith (MI No. P73439)  
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*Attorney for Plaintiff*

\_\_\_\_\_ /

Case No. 2:22-cv-13044-GAD-DRG

District Judge: Gershwin A. Drain  
Magistrate Judge: David R. Grand

**NOTICE OF COMPLIANCE FOR  
REMOVAL**

**TO THE CLERK OF THE U.S. DISTRICT COURT FOR THE EASTERN  
DISTRICT OF MICHIGAN AND TO PLAINTIFF NORTHPOINTE  
TOWNHOMES CONDOMINIUM ASSOCIATION, AND THEIR  
ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that, 12/15/2022, Defendant MEGMAD FAMILY TRUST filed a Notice of Filing of Notice of Removal with the Circuit Court of the State of Michigan for the County of Wayne and served it on counsel for Plaintiff. Defendant also served a Notice to Adverse Party of Removal to Federal Court, in compliance with 28 U.S.C. § 1446(d).

A conformed copy of the referenced Notice of Filing of Notice of Removal (without exhibits) is attached as **Exhibit A**. A conformed copy of the referenced Notice to Adverse Party with the proof of service is attached as **Exhibit B**.

Respectfully Submitted,

GOLDBERG & ASSOCIATES

Dated: December 16, 2022

/s/ Julie Goldberg

By: Julie Goldberg (CA Bar No. 235565)  
*Attorneys for Defendant*

# EXHIBIT A

**STATE OF OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

NORTHPOINTE TOWNHOMES CONDOMINIUM  
ASSOCIATION,  
a Michigan nonprofit corporation,  
Plaintiff,

Case No. 22-014146-CH  
Hon.. Patricia Perez Fresard

v.

**NOTICE OF FILING OF  
NOTICE OF REMOVAL**

MEGMAD FAMILY TRUST,  
  
Defendant.

\_\_\_\_\_/

Monica R. Smith (P73439)  
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*Attorney for Plaintiff*

\_\_\_\_\_/

**NOTICE OF REMOVAL**

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on 12/15/22, Defendant MEGMAD FAMILY TRUST in the above-captioned action removed this action to the United States District Court for the Eastern District of Michigan, by filing a Notice of Removal in that Court. A true and correct copy of the Notice of Removal is attached as **Exhibit A**. Pursuant to 28 U.S.C. § 1446(d), this Court may proceed no further unless until the case is remanded.

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Respectfully Submitted,

GOLDBERG & ASSOCIATES

Dated: December 15, 2022

/s/ Monica Smith

By: Monica R. Smith (P73439)

*Attorneys for Defendant*

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

NORTHPOINTE TOWNHOMES  
CONDOMINIUM ASSOCIATION,  
a Michigan nonprofit corporation,

Plaintiff,

v.

MEGMAD FAMILY TRUST,

Defendant.

\_\_\_\_\_ /

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*Attorney for Plaintiff*

\_\_\_\_\_ /

Case No.: 2:22-cv-13044-GAD-DRG

District Judge: Gershwin A. Drain  
Magistrate Judge: David R. Grand

**NOTICE TO ADVERSE PARTY OF  
REMOVAL TO FEDERAL COURT**

**TO PLAINTIFF NORTHPOINTE TOWNHOMES CONDOMINIUM  
ASSOCIATION, AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on, 12/15/2022, a Notice of Removal was filed in the United States District court for the Eastern District of Michigan. A copy of the Notice of Removal is attached as **Exhibit A**, and is served and filed herewith.

Respectfully Submitted,

GOLDBERG & ASSOCIATES

Dated: December 15, 2022

/s/ Julie Goldberg

By: Julie Goldberg (CA Bar No. 235565)

*Attorneys for Defendant*



**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2022, I mailed this **Notice to Adverse Party of Removal to Federal Court** by United States Postal Service, first class postage prepaid, and by electronic mail to Plaintiff's counsel below:

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Clement Leung